

United States District Court
Southern District Of New York

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This Document Relates to:

New York Marine and General Insurance Co. v. Al Qaida, et al., 04-CV-6105 (RCC)

**STIPULATION WITH REGARD TO RULINGS ON MOTION TO DISMISS
OF DEFENDANT HRH PRINCE SALMAN BIN ABDULAZIZ AL-SAUD IN
RELATED CASES**

WHEREAS the plaintiff in the action entitled New York Marine and General Insurance Co. v. Al Qaida, et al. (the "Action") commenced the Action on August 6, 2004;

WHEREAS HRH Prince Salman bin Abdulaziz Al-Saud ("Prince Salman") is named as a defendant in the Action;

WHEREAS Prince Salman has filed a consolidated motion to dismiss the complaints naming him as a defendant in the following related cases (the "Related Cases"): *Ashton v. Al Qaeda Islamic Army*, 02-CV-6977 (RCC); *Barrera v. Al Al Qaeda Islamic Army*, 03-CV-7036 (RCC); *Burnett v. Al Baraka Investment & Development Corp.*, 03-CV-5738 (RCC); *Burnett v. Al Baraka Investment & Development Corp.*, 03-CV-9849 (RCC); *Federal Insurance Co. v. Al Qaida*, 03-CV-6978; *Salvo v. Al Qaeda Islamic Army*, 03-CV-5071 (RCC) (the "Consolidated Motion");

WHEREAS Prince Salman's Consolidated Motion has been ruled on by the Court in its Opinion and Order dated September 21, 2005;

WHEREAS the allegations in the Action parallel those in the complaints filed in the Related Cases and, in many instances, are identical to them; in particular, the

allegations that make specific reference to Prince Salman in the Action are substantially similar to those in the Related Cases;

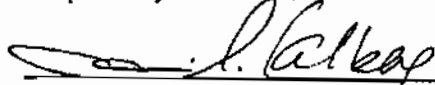
WHEREAS the parties hereto wish to avoid, if possible, burdening the Court with additional filings or themselves with unnecessary litigation costs;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. The parties hereto adopt as a binding order in the Action, with regard to Prince Salman, the Opinion and Order of this Court dated September 21, 2005, deciding the Consolidated Motion (the "Order").

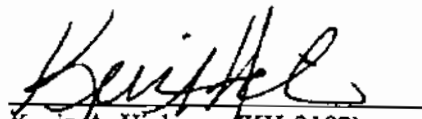
2. In the event the Order is appealed, the parties hereto will adopt as a binding order in the Action, with regard to Prince Salman, any subsequent rulings by any appellate courts with regard to the Order.

Respectfully submitted,



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SO ORDERED:



Richard C. Casey
U.S.D.J.

Date: November 17, 2005